

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

VIRGINIA COLE, individually and	:	CIVIL ACTION
On behalf of all others similarly	:	
situated,	:	
	:	Case No.: 5:25-CV-03531-CH
Plaintiff,	:	
	:	
v.	:	
	:	HENRY, J.
C/T INSTALL AMERICA, LLC	:	
	:	
Defendant.	:	

**C/T INSTALL AMERICA'S FIRST, UNOPPOSED MOTION
FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S COMPLAINT**

Plaintiff, C/T Install America, LLC (“Install America”), through counsel and under the Federal Rules of Civil Procedure, hereby requests the Court enter an Order granting Install America a 30-day extension of time to respond to the Complaint (Doc. 1) filed by plaintiff, Virginia Cole (“Plaintiff”), and states:

1. On March 5, 2025, Plaintiff filed his Complaint in the captioned matter naming AR Resources as Defendant. *See* Doc. 1. Install America was served with Summons a copy of the Complaint on July 14, 2025. (Doc. 6). Accordingly, Install

America's responsive pleadings are currently due on August 4, 2025. *See* Fed. R. Civ. P. 12(a).

2. Install America and its counsel are still in the process of gathering the relevant facts and preparing a response to the Complaint. Undersigned counsel estimates that a 30- day extension of time for Install America to respond to the Complaint will afford it the necessary opportunity to complete its initial investigation and respond to the Complaint. Install America requests this extension not for purposes of delay, but so that it has additional time to complete its initial investigation and properly respond to the Complaint.

3. Undersigned counsel confirms he has conferred with counsel for Plaintiff regarding the requested relief, who consented to a 30-day extension of time for Install America to file its responsive pleadings.

4. This is Install America's first request for extension. Install America has not previously requested or received any prior extensions of its responsive pleadings deadline.

5. Granting the requested relief will not prejudice any party or unduly delay these proceedings. In particular, a Case Management Plan has not been issued, and the requested extension does not affect any other case deadlines.

WHEREFORE, Defendant, C/T Install America respectfully requests this Court grant a 30-day extension through and including September 3, 2025, for C/T

Install America, LLC to file responsive pleadings to Plaintiff's Complaint, and for such other relief as this Court deems proper.

Respectfully submitted,

MUIR LAW OFFICES

August 2, 2025

/s/ Andrew W. Muir
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CERTIFICATE OF SERVICE

I certify that on August 2, 2025, a copy of the foregoing was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system.

By: /s/ Andrew W. Muir
Andrew W. Muir, Esquire